SOUTHERN DISTRICT OF NEW	YORK		
		X	
NETWORK DATA ROOMS, LLC,		:	
NETWORK DATA ROOMS, EEC,	Plaintiff,	:	
	,	:	22 Civ. 2299 (LGS)
-against-		:	
		:	ORDER
SAULREALISM LLC, et al.,		:	
	Defendants.	:	
		:	
		X	
LORNA G. SCHOFIELD, District Ju	dge:		

WHEREAS, on September 6, 2022, and September 17, 2022, David Delorge mailed to the Court an affidavit asserting his Fifth Amendment right against self-incrimination and accompanying documents. The affidavit and accompanying documents are attached to this Order. It is hereby

**ORDERED** that each party may, but need not, file a letter as to the significance of the contents, if any. Such letters, not to exceed three pages, shall be filed no later than **October 14**, **2022.** 

Dated: October 5, 2022

New York, New York

UNITED STATES DISTRICT COURT

United States District Judge

David J Delorge 1 Email: ddelorge@dapicorp.com 2 3 UNITED STATES DISTRICT COURT 4 SOUTHERN DISTRICT OF NEW YORK 5 6 7 NETWORK DATA ROOMS, LLC, Case No.: 22 Civ. 2299 (LGS) 8 Plaintiff, 9 REPLY AFFIDAVIT -against-10 SAULREALISM LLC, ET AL.,, 11 Defendant 12 13 14 15 To the honorable LORNA G. SCHOFIELD, District Judge: 16 17 I, David J DeLorge, being duly sworn, hereby deposes and says: 18 Your Honor, 19 May it please you and this court, I am self-filing a REPLY AFFIDAVIT in conjunction with this 20 case. I no longer work for NETWORK DATA ROOMS, LLC, and humble request to be removed 21 from this case in all forms. I have felt harassed and hounded by this company over this case, 22 which lead to health issues. 23 24 As for the 'Email' in question, the 'Original Email thread is attached', for your review in 25 entirety. 26 27 28 REPLY AFFIDAVIT - 1

1	
2	I did not give this email to any lawyers, and the information I provided NETWORK DATA
3	ROOMS, is also attached.
4	
5	I humbly, as given the option,
6	assert my Fifth Amendment right against self-incrimination,
7	as I was not in possession on this 'Evidence', nor do I know the
8	chain of custody it went through, as there were hundreds of emails and passed around.
9	
10	I beg this court, to grant my pleas above and to allow me to step away from this case in entirety.
11	
12	Thank you for your time, your Honor.
13	
14	
15	David J Delorge
16	
17	
18	Notary Republic
19	
20	
21	Notary #
22	
23	
24	Dated this day of Month, year.
25	
26	
27	
28 H	

REPLY AFFIDAVIT - 2

From: David Delorge <ddelorge@dealtable.onmicrosoft.com>

Sent: Sunday, January 17, 2021 8:52 AM

To: Ryan Saul

Subject: RE: quick question on source control

Awesome, Thank you- Was just getting latest, making sure I had the right branch. Shave a great weekend

From: Ryan Saul <rsaul@dealtable.com> Sent: Saturday, January 16, 2021 8:45 PM

To: David Delorge <ddelorge@dealtable.onmicrosoft.com>

Subject: Re: quick quesrion on source control

Correction: project ndr\_frontend\_v2, branch GraphAPILogin

From: Ryan Saul < rsaul@dealtable.com > Sent: Saturday, January 16, 2021 9:44 PM

To: David Delorge < ddelorge@dealtable.onmicrosoft.com >

Subject: Re: quick question on source control

New branch under project backend v2. Branch name is GraphAPILogin.

From: David Delorge <ddelorge@dealtable.onmicrosoft.com>

Sent: Saturday, January 16, 2021 9:42 PM
To: Ryan Saul < rsaul@dealtable.com >
Subject: quick quesrion on source control

Hi ya, May I ask where your committing code to? I was looking through the Projects in Azure Devops- and wondered which project your using?

Projects - Home (azure.com)

**Thanks** 

David J. DeLorge

Chief Cloud Architect Team Lead

Cell Phone# 571-214-0156

Microsoft CIE TEAMS Trainer
Microsoft Certified Azure Architect
Microsoft Certified Customer Immersion Expierience Instructor
Microsoft Certified AI Engineer
Microsoft Certified Security Engineer
Microsoft Certified Azure Administrator

From:

David Delorge <ddelorge@dealtable.onmicrosoft.com>

Sent: To: Tuesday, January 18, 2022 10:27 AM Chris Concannon; Thomas Concannon

Subject:

RE: I would like you to lock out Ryan of the Azure Network software

Turned back on...

Will find our job Posting and send it over.

Thank you

From: Chris Concannon <chrisc@networkdatarooms.com>

Sent: Tuesday, January 18, 2022 10:26 AM

To: David Delorge <ddelorge@dealtable.onmicrosoft.com>; Thomas Concannon <thomasc@networkdatarooms.com>

Subject: Re: I would like you to lock out Ryan of the Azure Network software

David

Turn Ryan back on again.

This is her last chance. I told one more Terrorist hostage threat it's over. Thomas has friend VC firm that is going to help find a back end coder in C#. Can you send Thomas the language you used for indeed.

Thanks

Chris

Thanks,

Chris

Chris T. Concannon

Partner

**Network Data Rooms** 

257 W. 38th Street, 2nd Floor

New York, NY 10018 Cell: (917) 374-0020

chrisc@networkdatarooms.com

Certified. ISO 27001/SOC 2/Office 365

Service • Quality • Experience "We Always Have Your Back"

From: David Delorge <ddelorge@dealtable.onmicrosoft.com>

**Sent:** Tuesday, January 18, 2022, 11:29 AM **To:** Chris Concannon; Thomas Concannon

Subject: RE: I would like you to lock out Ryan of the Azure Network software

All access removed.

Her account is still their but blocked. I recommend we pull all her emails and assign her Mailbox to someone and her chats before deleting.

Please advise on next steps.

Thank you.

(Also Locked out of Azure and All Services)

From: Chris Concannon < chrisc@networkdatarooms.com >

Sent: Tuesday, January 18, 2022 9:07 AM

To: David Delorge < <a href="mailto:delorge@dealtable.onmicrosoft.com">dealtable.onmicrosoft.com</a>; Thomas Concannon < <a href="mailto:thomasc@networkdatarooms.com">thomasc@networkdatarooms.com</a>>

Subject: I would like you to lock out Ryan of the Azure Network software

### David

I would like you to lock out Ryan of the Azure Network software and make sure we have the latest version.

Please confirm when this is completed.

Please confirm

I will call you to confirm

Thanks,

Chris

--

Chris T. Concannon

Partner

**Network Data Rooms** 

257 W. 38th Street, 2nd Floor

New York, NY 10018 Cell: (917) 374-0020

chrisc@networkdatarooms.com

From: David Delorge < <a href="mailto:ddelorge@dealtable.onmicrosoft.com">ddelorge@dealtable.onmicrosoft.com</a>>

Sent: Saturday, January 15, 2022 2:08 PM

**To:** Thomas Concannon < <a href="mailto:thomasc@networkdatarooms.com">thomasc@networkdatarooms.com</a> <a href="mailto:centworkdatarooms.com">centworkdatarooms.com</a> <a href="mailto:centworkdatarooms.com">centworkdatarooms.

Subject: RE: Hey guys we need DealTable email addresses setup for us

Doing so now..

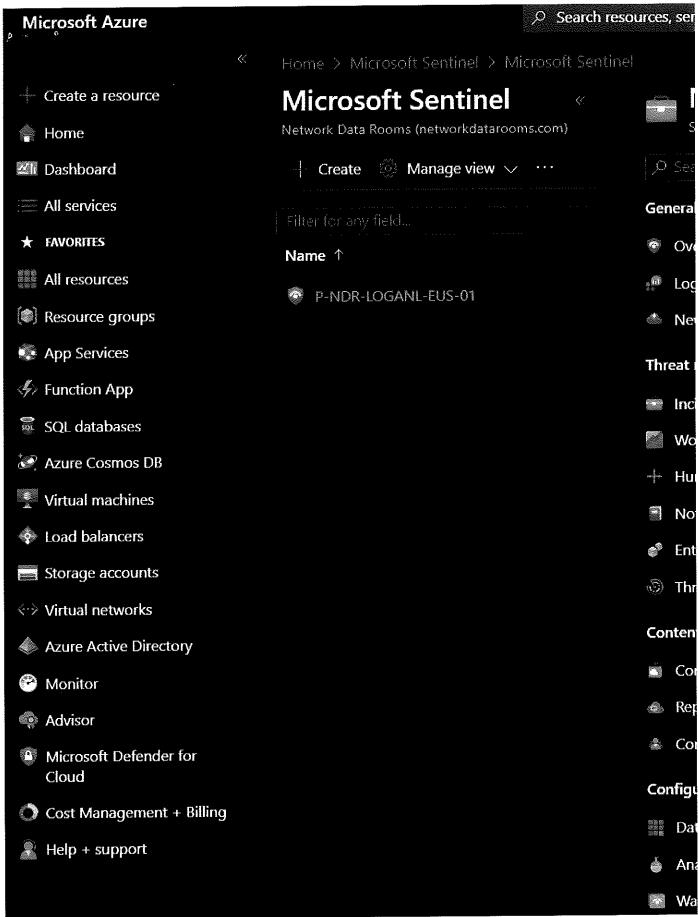
On another point- Our Sentinel Security discovered our VM's for dealtable are vulnerable for LOG4J.

I am updating the security patches and will work with Ryan on Monday to make sure all the PDF apps, and Only office are up to date as well.

I will email you (@Thomas Concannon) the User names and New TEMP. passwords.

You can distribute.

Thanks



From: Thomas Concannon < thomasc@networkdatarooms.com >

Sent: Saturday, January 15, 2022 11:44 AM

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Subject: Re: Hey guys we need DealTable email addresses setup for us

Awesome, thanks David. Please reset the passwords and let us know what they are. We would like to start using the @dealtable emails asap.

Thanks, Thomas

Thomas Concannon Network Data Rooms 257 W. 38th Street, 2nd Floor New York, NY 10018

Cell: (917) 855-7138

thomasc@networkdatarooms.com

On Jan 15, 2022, at 12:13 PM, David Delorge < <a href="mailto:ddelorge@dealtable.onmicrosoft.com">ddelorge@dealtable.onmicrosoft.com</a> wrote:

Email address and account exist for the below list. DO you need these accounts and Passwords reset? If so please advise.

Thank you

From: Chris Concannon < <a href="mailto:chrisc@networkdatarooms.com">chrisc@networkdatarooms.com</a>>

Sent: Friday, January 14, 2022 1:32 PM

**To:** Thomas Concannon < <a href="mailto:thomasc@networkdatarooms.com">thomasc@networkdatarooms.com</a> <a href="mailto:cc:">Cc: David Delorge < <a href="mailto:ddelorge@dealtable.onmicrosoft.com">ddelorge@dealtable.onmicrosoft.com</a> >

Subject: Hey guys we need DealTable email addresses setup for us

Hey guys we need DealTable email addresses setup for us Can we get these set up for next week

Chrisc Thomasc Jackc Davidd

Accounting

CustomerService

Sales

SoftwareTraining

Thanks, Chris --

Chris T. Concannon
 Network Data Rooms
 257 W. 38th Street, 2nd Floor

New York, NY 10018 Cell: (917) 374-0020

chrisc@networkdatarooms.com

From: David Delorge <ddelorge@dealtable.onmicrosoft.com>

**Sent:** Sunday, August 28, 2022 10:52 AM

To: delorgedj@outlook.com

Subject: Fw: 1:22-cv-02299-LGS Network Data Rooms, LLC v. Saulrealism LLC et al

Attachments: OTSC.pdf; Plaintiff's Letter to Judge Schofield 8.9.22.pdf; Hon Schofield 8-5-2022.pdf

From: Nicholas Fortuna <nfortuna@allynfortuna.com>

Sent: Wednesday, August 17, 2022 11:06 AM

To: David Delorge <ddelorge@dealtable.onmicrosoft.com>

**Cc:** Paula Lopez <plopez@allynfortuna.com>; Chris Concannon chrisc@networkfinancialprint.com <chrisc@networkfinancialprint.com>; Thomas Concannon <thomasc@networkdatarooms.com>

Subject: 1:22-cv-02299-LGS Network Data Rooms, LLC v. Saulrealism LLC et al

### David.

The judge ordered an evidentiary hearing regarding your email. She wants you to appear on September 20 at 2:00. See attached documents. I advise that you get an attorney to represent you. Because of this order, we have a conflict that prevents us from representing you.

The court's contact information is as follows:

Lorna G. Schofield United States District Judge Courtroom 1106 40 Centre Street Mr. James Street, Courtroom Deputy (212) 805-4553 Chambers (212) 805-0288

Regards, Nick

Nicholas Fortuna
Allyn & Fortuna LLP
400 Madison Avenue, 10th Floor
New York, New York 10017
(212) 213-8844
(212) 213-3318 (fax)
nfortuna@allynfortuna.com
www.allynfortuna.com

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Please confirm when this is completed.

Please confirm

I will call you to confirm

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Chris T. Concannon

Partner

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Subject: RE: Hey guys we need DealTable email addresses setup for us

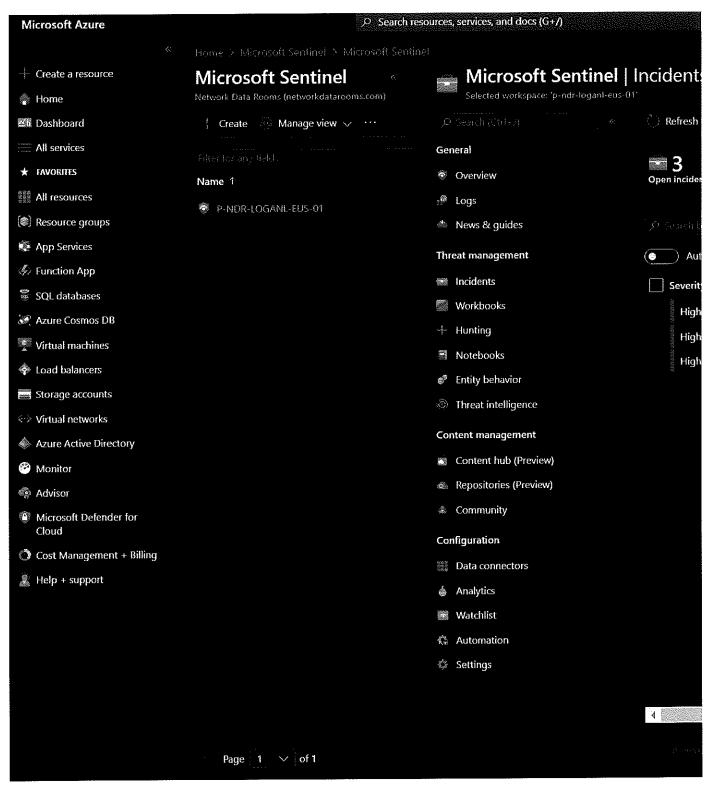
Doing so now..

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I am updating the security patches and will work with Ryan on Monday to make sure all the PDF apps, and Only office are up to date as well.

I will email you (@Thomas Concannon) the User names and New TEMP. passwords. You can distribute.

#### Thanks



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Chrisc

Thomasc

Jackc

Davidd

Accounting

CustomerService

Sales

SoftwareTraining

Thanks,

Chris

Chris T. Concannon **Network Data Rooms** 257 W. 38th Street, 2nd Floor New York, NY 10018

Cell: (917) 374-0020 chrisc@networkdatarooms.com

From: David Delorge <ddelorge@dealtable.onmicrosoft.com>

Sent: Sunday, February 20, 2022 8:57 AM

To: Thomas Concannon; Thomas Concannon; Chris Concannon

Cc: Nicholas Fortuna

Subject: Re: SEE below: FW: Meeting today at 5pm 1.19.22

My apologies on the date error, and the times were my time not est.

I'll correct

## Get Outlook for Android

From: Thomas Concannon < thomasc@networkdatarooms.com>

Sent: Saturday, February 19, 2022 6:42:27 PM

To: David Delorge <ddelorge@dealtable.onmicrosoft.com>; Thomas Concannon <tconcannon@dealtable.com>; Chris

Concannon <chrisc@networkdatarooms.com>
Cc: Nicholas Fortuna <nfortuna@allynfortuna.com>

Subject: Re: SEE below: FW: Meeting today at 5pm 1.19.22

Just to clarify...couple of issues with the email below in regards to the timeline. 1. Everything went down on 1/18/22 not 1/17/22. Did you talk to her on the 17th about this? 2. You said 10:30am MST is when it all went down but it was at 1:30 MST and she deleted everything after that meeting went south and her last log in failed attempt was at 2:00:38 MST.

### TimeLine:

Tuesday Jan 17th, 2022 (8:45 am)

Ryan Saul Teams Messaged me she 'Had' to talk ASAP. She then Called my cell phone at 8:40 amtelling me she was tired of Thomas not giving her a list to complete, that everyone is a dumb ass etc. She then asked me if to get "Them" (Thomas and Chris) upset, if she could delete the Dev Code and show them that she had them in a corner and they have to do what she wanted. I Vehemently told her #1. You cannot delete the code, #2. It's a breach of contract and a felony. She laughed it off, said she was playing and I told her I had to go, and hung up.

Tuesday Jan 17th, 2022 (9 am)

I was Teams Messaged by Chris Concannon to block Ryan Saul's access to Azure and Office 365. I immediately went into the system and blocked her access.

She at this time threatened to do something harmful.

Tuesday Jan 17th, 2022 (10:30 am)

@ approx. 10:30 am we had a meeting with Ryan – after I was told to re-enable her account, which I did. We were on a Teams call with her and she said she was tired of the BS and that they didn't and couldn't continue without her. Chris Concannon then explained that he was done dealing with her disrespect and threats. He told her she was no longer working on the project and was fired. Ryan Saul then hung up.

At that Time I was told to go block her account again and cut off her access. This process takes less hen a min to accomplish.

In that minute, Ryan Saul deleted all the tables from the Application DB and deleted the Web App itself and was trying to create a back door into the Network Security.

This had to be pre-staged and set up and ready for her to just run the query to delete the SQL DB tables and Delete the app.

Once I discovered what she had done, I began retrieving our Disaster Recovery backups and re-deploying the system. She has embedded re-write code in the DB on 1/18/2022 around 9:50 am and also removed all admin privileges to the web app. I was forced to retrieve a 'Good" copy of the application from Thursday Evening at 11:55 PM to restore it to working order.

Around 4:04 pm MST time Ryan Saul called my phone again. I answered and asked why she deleted these services. She laughed and said that they deserved it. I explained to her not to call my cell again and these actions are illegal. She said she was calling to ask me to be a reference. I then said again, do not call me, you have broken your NDA and I now need to fix everything. She then told me to tell Thomas and Chris she would fix it for them, if they still wanted her to conitinue to work. I hung up.

I have blocked, removed and added her IP's and location to our security blocks and am monitoring all activity, as this morning around 6am, she tried again to access the system.

Attached please find evidence and Logs of the above.

### Get Outlook for iOS

From: David Delorge <ddelorge@dealtable.onmicrosoft.com>

Sent: Saturday, February 19, 2022 8:12:40 PM

To: Thomas Concannon <thomasc@networkdatarooms.com>; Thomas Concannon <tconcannon@dealtable.com>; Chris

Concannon < chrisc@networkdatarooms.com>

Subject: SEE below: FW: Meeting today at 5pm 1.19.22

Notice Timeline and What happened. As I said, I did communicate what was happening. I also reached out in Teams and communicated.

See highlighted items.

That aside..

We need to ask the lawyers to allow us to ask for this.

We want the Deatable ( dev-dealtable ) code base, 'Complete' from Jan 16<sup>th</sup>, 2022 as the Repo in Dealtable Azure Devops has not been updated since Sept 26, 2021.

We require access or a zip copy of the complete codebase. (Zip copy preferred).

We have everything else.

Please advise ASAP.

Thank you

From: David Delorge

Sent: Wednesday, January 19, 2022 1:16 PM

To: Thomas Concannon < thomasc@networkdatarooms.com>; Nicholas Fortuna < nfortuna@allynfortuna.com>; Chris

Concannon <chrisc@networkdatarooms.com> **Subject:** RE: Meeting today at 5pm 1.19.22

Please see the below TimeLine and details.

Screen Shots are in the word doc and the Excel Doc shows Signs and attempted sign in's.

### TimeLine:

Tuesday Jan 17th, 2022 (8:45 am)

Ryan Saul Teams Messaged me she 'Had' to talk ASAP. She then Called my cell phone at 8:40 am telling me she was tired of Thomas not giving her a list to complete, that everyone is a dumb ass etc. She then asked me if to get "Them" (Thomas and Chris) upset, if she could delete the Dev Code and show them that she had them in a corner and they have to do what she wanted. I Vehemently told her #1. You cannot delete the code, #2. It's a breach of contract and a felony. She laughed it off, said she was playing and I told her I had to go, and hung up.

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- Chris Concannon Vesterday 8:44 AM
  STOP MAKING DEMANDS BECAUSE IT IS NO GOING WELL ON MY END. ITS GETTING VERY ANNOYING AND TRYING MY
  PATIENCE. IF IS NOT GOING TO LAST VERY LONG IF YOU KEEP UP THIS SHIT UP, IF YOU WANT TO QUIT JUST QUIT.
- Chris Concannon Vesterday 8:58 AM

  Ryan, Finish the software or I am asking David to find a new coder. We are not going to continue to work like this anymore. Your job is to make the changes we give and make them correctly and if you do not want to do this job anymore then tell me now because I am not going to play this game anymore of you trying to hold us hostage and tell us what you are going to do and not do. I want an answer now!!! If I don't get an answer from you in the next 10 minutes then you will be asked to leave this project. How does that sound. You have pushed me to my limit. You seem like a sensible person and you have worked had but you attitude is getting old now. So change or leave. There is no in-between. If I don't here from you I have you answer.
- CC Chris Concannon Yesterday 9:07 AM
  You have two minutes to answer

Ryan Saul Vesterday 1:44 PM
You will not fix this problem by hiring another developer. You will now go find that the hard way. Call me back after you have done that.

CC Chris Concannon Vesterday 145 PM
Yu had your chance to do your work and stop complaining. Its over

### Tuesday Jan 17th, 2022 (10:30 am)

@ approx. 10:30 am we had a meeting with Ryan – after I was told to re-enable her account, which I did. We were on a Teams call with her and she said she was tired of the BS and that they didn't and couldn't continue without her. Chris Concannon then explained that he was done dealing with her disrespect and threats. He told her she was no longer working on the project and was fired. Ryan Saul then hung up.

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Attached please find evidence and Logs of the above.

Thank you

From: Thomas Concannon < thomasc@networkdatarooms.com >

Sent: Wednesday, January 19, 2022 12:35 PM

To: Nicholas Fortuna <nfortuna@allynfortuna.com>; David Delorge <ddelorge@dealtable.onmicrosoft.com>; Chris

Concannon < chrisc@networkdatarooms.com >

Subject: Meeting today at 5pm 1.19.22

Gentlemen,

I'm scheduling a meeting for us all to chat about the next steps as to how to handle this situation moving forward. Here is the zoom link for the 5pm meeting below. Talk then.

Thomas Concannon is inviting you to a scheduled Zoom meeting.

Topic: Thomas Concannon's Personal Meeting Room

Join Zoom Meeting

https://us02web.zoom.us/j/6412782365?pwd=TENjYW4xd2xnZ1FwSkpidzdCNm9Cdz09

Meeting ID: 641 278 2365

Passcode: 652867 One tap mobile

+16465588656,,6412782365#,,,,\*652867# US (New York)

+13126266799,,6412782365#,,,,\*652867# US (Chicago)

Dial by your location

+1 646 558 8656 US (New York)

- +1 312 626 6799 US (Chicago)
- +1 301 715 8592 US (Washington DC)
- +1 346 248 7799 US (Houston)
- +1 669 900 9128 US (San Jose)
- +1 253 215 8782 US (Tacoma)

Meeting ID: 641 278 2365

Passcode: 652867

Find your local number: https://us02web.zoom.us/u/kcOVHVFEIC

Best, Thomas

Thomas Concannon CEO Network Data Rooms 257 W. 38th Street, 2nd Floor New York, NY 10018

Cell: (917) 855-7138

thomasc@networkdatarooms.com

From: David Delorge <ddelorge@dealtable.onmicrosoft.com>

**Sent:** Monday, February 21, 2022 3:03 PM **To:** Thomas Concannon; Thomas Concannon

Subject: Stolen Code and what we need

DealTable & NDR was set up with Microsoft Azure Devops and Azure Devops Source Code Repositories. We created a Secure, restricted access Repository for our code in December 2020.

This Code base was shared with our developers and they were directed to work from the repo and the repo only, and were provided a Virtual Desktop to work with the code and Software programs.

We also, up until August 2021 used the Azure Devops Repo Boards and Tasks to track code changes and accomplishments.

We then moved to only one developer, Ryan Saul, and it was more convenient to work off a running list in Teams and meetings.

As of Sept 26<sup>th</sup>, 2021, Ryan Saul stopped updating the 'Real" new code to the repo, and occasionally just checked in the old code, to make it look like she was adhering to our code check-in rule.

She was not. She downloaded the code base, and was making changes to DealTable Code on a hidden, self owned repository in GitHub.

When she was let go, she did NOT check in the current code base.

We are currently trying to rebuild the code base as Ryan saul stole this, by developing the code and pushing it to our web app from her own repository. This was done intentionally and behind our backs. The left behind code base is from 9/26 and there are multiple add ins, connections, and even purchased Certificates missing from the left behind files she left.

What we need, <u>ASAP</u>, is the entire code base from 1/16/2022. She can either send it to us in a zip file or give us access to her hidden repo.

Without this code base, and all the missing connections and scrambled page connections, DealTable is left with weeks of re-compiling the code and trying to figure out all the broken pieces.

My recommendation is to have someone reach out and get the code and offer a deal to leave her alone with anything else if she complies.

DealTable used every security precaution and platform, including full backups, secure accessibility, Privileged Identity Management, DLP and Virtual Desktops for this development project.

This 'Theft' of code was don from the inside and pre-planned.

Without having someone check the code checking, details and lines, daily, there was no way to know this individual was doing what she was doing, at the time.

I am writing this from a hospital bed, waiting for another test as I woke up at 4:30 am this morning in the ER. This entire last 2 month, since Jan 18<sup>th</sup> has caused myself and others extreme stress. I literally spent almost 9 hours yesterday trying to re-compile the "Working" code pages to get DealTable at least back on the move and re-installing out Only Office add ins and software in our environment.

I am not sure at this moment what else to do but I again say this, this was an under-handed, planned act and against our security and policies.

Ryan' Saul needs to give us the code base back from 1/16/2022 ASAP – as this is DealTabl's property.

Thank you

From: David Delorge <ddelorge@dealtable.onmicrosoft.com>

Sent: Tuesday, January 18, 2022 4:02 PM

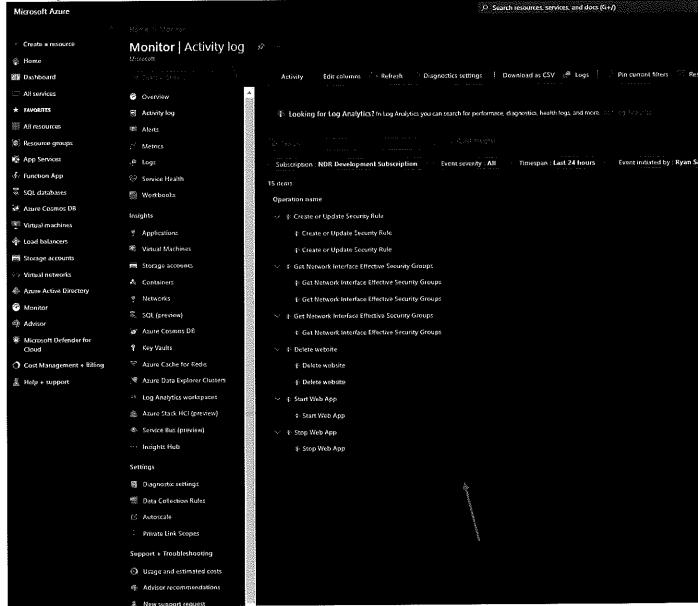
To: Thomas Concannon; Jack Concannon; Chris Concannon

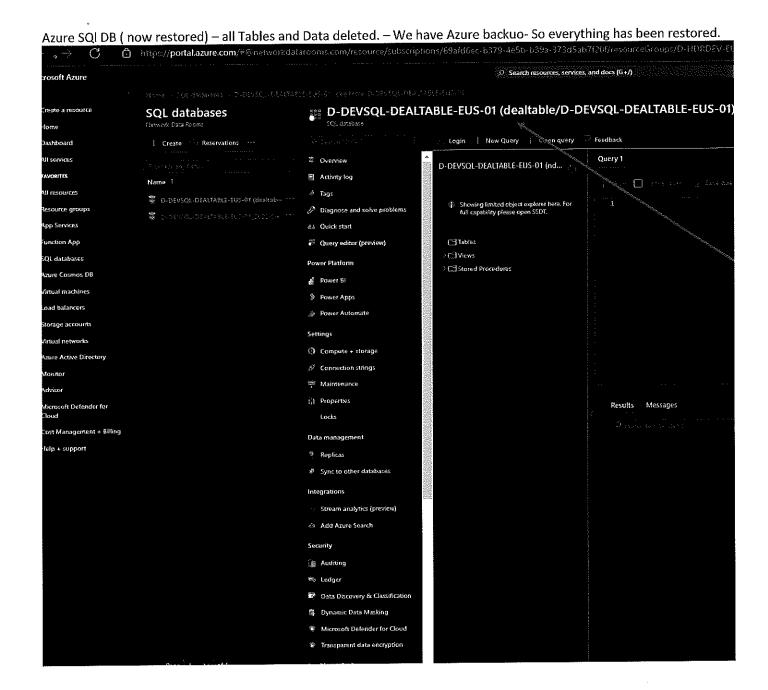
**Subject:** DealTable.com - Developer Malicious actions.

The following has been discovered in the 1 Min, 42 seconds it took to Lock our Ryan Saul.

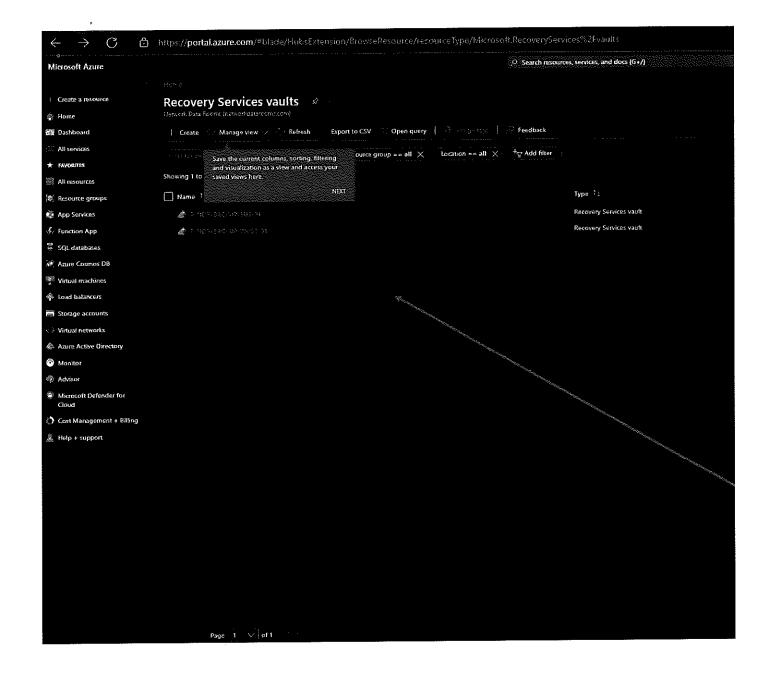
Only explanation is, she must have had Scripts, and Azure open and once was told she was OFF the project, began, intentionally, changing, deleting and making as much as a mess as possible.

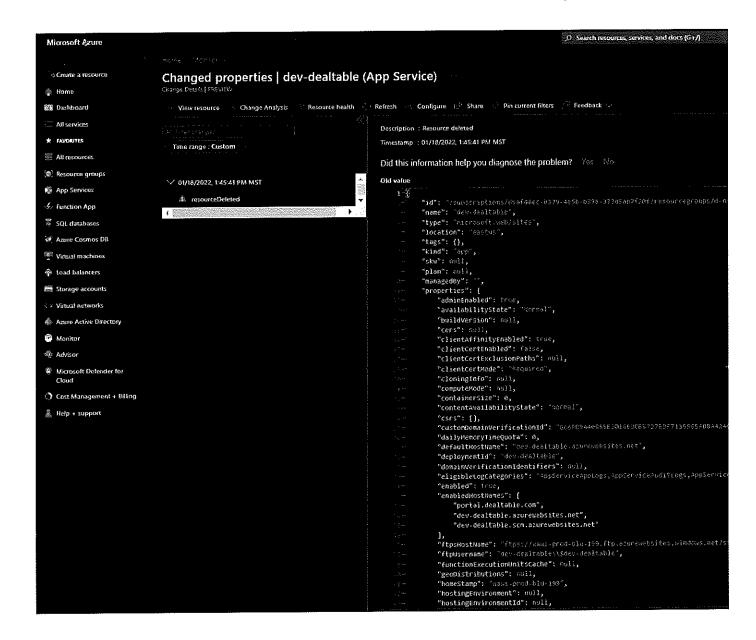
Azure Logs:





DealTable dev-dealtable.com web app deleted. – Web App restored and reconnecting SQL and Pages-





User Completely Locked – out and access removed.

Please advise if Further information is needed.

### David J. DeLorge

Chief Cloud Architect / Cloud Security Engineer Cell Phone# 571-214-0156

Microsoft CIE TEAMS Trainer
Microsoft Certified Teams Administrator
Microsoft Certified Azure Architect
Microsoft Certified Customer Immersion Expierience Instructor

Microsoft Certified AI Engineer
Microsoft Certified Azure Security Engineer
Microsoft Certified Azure Administrator
Microsoft Cetified Security Engineer Office365
Microsoft Certified 365 Identity and Services
EHC Certified White Hat Hacker 2019
AWS Certified cloud developer
Microsoft Certified Cloud Apps Developer
SNOWFLAKE Certified Data Warhouse
AWS Architect
267 Microsoft Badges & 52 Trophies







Gold Could Continue Relationship Management Gold Could Picthian







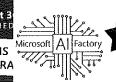
















Stay Connected:







David J Delorge 1 Email: ddelorge@dapicorp.com 2 3 UNITED STATES DISTRICT COURT 4 SOUTHERN DISTRICT OF NEW YORK 5 6 7 Case No.: 22 Civ. 2299 (LGS) NETWORK DATA ROOMS, LLC, 8 Plaintiff, 9 REPLY AFFIDAVIT -against-10 SAULREALISM LLC, ET AL.,, 11 Defendant 12 13 14 15 To the honorable LORNA G. SCHOFIELD, District Judge: 16 17 I, David J DeLorge, being duly sworn, hereby deposes and says: 18 Your Honor, 19 May it please you and this court, I am self-filing a REPLY AFFIDAVIT in conjunction with this 20 case. I no longer work for NETWORK DATA ROOMS, LLC, and humble request to be removed 21 from this case in all forms. I have felt harassed and hounded by this company over this case, 22 which lead to health issues. 23 24 As for the 'Email' in question, the 'Original Email thread is attached', for your review in 25 entirety. 26 27 28 REPLY AFFIDAVIT - 1

Į I did not give this email to any lawyers, and the information I provided NETWORK DATA ROOMS, is also attached. I humbly, as given the option, assert my Fifth Amendment right against self-incrimination, as I was not in possession on this 'Evidence', nor do I know the chain of custody it went through, as there were hundreds of emails and passed around. I beg this court, to grant my pleas above and to allow me to step away from this case in entirety. Thank you for your time, your Honor. Dated this day of Month, year. 

REPLY AFFIDAVIT - 2

Jurat Notary Certificate (Only for use in AR, AZ, CO, CT, DC, DE, GA, ID, IA, IL, KS, KY, MA, MD, ME,

MN, MO, MT, NH, NJ, NM, NY, NV, NC, OH, OK, OR, PA, RI, SC, TX, UT, VA, WA)

Document Name: Reply Affidarit
STATE OF COLOVA CO COUNTY OF DOY A S (County where notarization occurred)
Subscribed and sworn before me on
MARY BROST NOTARY PUBLIC STATE OF COLORADO  MARY BROST (Signature of notary public,
STATE OF COLORADO NOTARY ID 20134065556 MY COMMISSION EXPIRES OCT 18, 2025  MARY BROST , Notary Public, (Name of notary public,
My commission expires: <u>October 18</u>
Personally knownOR Produced identificationV_ Type of identification produced: CODL ! Microsoft Pic ID
Asdendom:
- The Documentalian Mentioned in the
Affi David has been sent previously
for Review.